

May 18, 2005

National Organic Standards Board
% Arthur Neal
Room 4008 - South Building
1400 and Independence Avenue SW
Washington, DC 20250-0001

Dear Mr. Neal:

I am writing in regards to the NOSB Guidance for Interpretation of section 205.239(a)(2) of the National Organic Program, published for public comment on March 22nd.

I am against certain portions of the language of Sections (A) and (C), and I am in favor of the language in section (B).

I have financial concerns about how the restrictions of sections A and C could slow the growth of organic dairies in my area or possibly lead to a loss of organic dairies. Restrictive sections such as these would have a definite negative impact on my ability to sell organic grain and forage to my dairy customers. I would like to see my business grow as the organic dairies grow and I am worried that this clause may hinder my ability to do so.

In Section (A), I am against two parts of the wording. First, I dislike the specific numerical requirement for 30% dry matter intake on a daily basis during the growing season but not less than 120 days. My farm grows alfalfa hay and barley which I sell to several different organic dairies. As an organic farmer I have found that there are many different climates, soils and farm management plans. Each farmer and their organic certifier should be given the interpretive freedom to develop their own organic farm plan that upholds organic standards and works in their specific location. I do this with my organic farm and my certifier. I would dislike any arbitrary numbers given to me nor would I ever dictate arbitrary numbers to any other organic farmer.

Second, I disagree with the five reporting requirements of this section. Organic farm plans already require a great deal of verification as to how the farm is to be managed. Additional reporting would be neither useful nor beneficial to the farmer or to the organic program. These five requirements are not workable nor are they even measurable. They impose additional burdens on a farm plan already filled with time-consuming, record-keeping and reporting requirements.

In Section (C), I disagree with using the NRCS for regulating dairy animal grazing. In my experience NRCS has only been used for beef cattle and not for dairy. I've talked to livestock people and they say the NRCS is not a good way to manage dairy pasture. It is better designed for cow-calf operations, where animals roam across the range for weeks or months at a time versus animals traveling back and forth to a barn several times a day.

I agree with Section (B) as dairy animals should be outside as much as possible and have access to some pasture.

Thank you for your time and consideration.

Sincerely,
Doug Hallowell
Dirk Hallowell

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OIO Ranch
Fairfield, Idaho